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Attorneys for Defendants and Counter-Plaintiffs
VICTOR COMPANY OF JAPAN, LTD. and JVC
COMPONENTS (THAILAND) CO., LTD., and Defendants
AGILIS INC. and AGILIS TECHNOLOGY INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

NIDEC CORPORATION

Plaintiff,

v.

VICTOR COMPANY OF JAPAN, LTD., JVC
COMPONENTS (THAILAND) CO., LTD.,
AGILIS INC., and AGILIS TECHNOLOGY
INC.,

Defendants,

NIDEC AMERICA CORPORATION and
NIDEC SINGAPORE PTE, LTD.,

Additional Defendants on
the Counterclaims.

Case No. C05 00686 SBA (EMC)

Action Filed: February 15, 2005

E-Filing

**STIPULATION AND [PROPOSED]
ORDER CONCERNING DISCOVERY**

Pursuant to Civil L.R. 6-2 and 7-12 of the Local Rules of Practice in Civil Proceedings before the United States District Court for the Northern District of California, the parties declare that:

WHEREAS all discovery, with certain exceptions, is to completed on or before January 10, 2007 (D.I. 294); and

WHEREAS the parties have agreed to extend this fact discovery deadline for the limited purpose of obtaining discovery from Seagate and for Nidec to produce documents in response to certain document requests previously made by JVC,

The parties stipulate to an order providing the following:

1. The parties agree that discovery requested from Seagate pursuant to subpoenas served by either party prior to January 10, 2007 may be obtained after the formal close of fact discovery on January 10, 2007.

2. The parties agree that Nidec shall produce all documents pursuant to Nidec's Objections and Responses to JVC's Fourth Set of Requests to Nidec for Production of Documents and Things (69-79), on or before January 20, 2007, notwithstanding the formal close of fact discovery on January 10, 2007.

3. The foregoing shall not be construed as an admission by either party for the purposes of precedent or argument in any other case.

IT IS SO STIPULATED.

Dated: January 10, 2007

MORGAN, LEWIS & BOCKIUS LLP
FRANKLIN BROCKWAY GOWDY
THOMAS D. KOHLER
DAVID C. BOHRER
MICHAEL J. LYONS
DION M. BREGMAN

By: /s/
THOMAS D. KOHLER

Attorneys for Plaintiff and Counter-Defendant
NIDEC CORPORATION and Additional
Defendants NIDEC AMERICA
CORPORATION and NIDEC SINGAPORE

1 Dated: January 10, 2007

2 HOWARD RICE NEMEROVSKI CANADY
3 FALK & RABKIN
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10 HOWARD WIZENFELD (*pro hac vice*)

11 By: /s/
12 ANTHONY F. LO CICERO

13 Attorneys for Defendants
14 Agilis Inc., and Agilis Technology Inc., and
15 Defendant and Counter-Plaintiff Victor
16 Company Of Japan, Ltd. and JVC Components
17 (Thailand) Co., Ltd.

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 Dated:

20 
21 HONORABLE SANDRA B. ARMSTRONG
22 United States Magistrate Judge

23 HOWARD RICE
24 NEMEROVSKI
25 CANADY
26 FALK
27 & RABKIN
28 A Professional Corporation

Pursuant to General Order No. 45, Section X(B) regarding signatures, I, Anthony F. Lo Cicero, attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 10th day of January 2007, at New York, New York.

/s/
ANTHONY F. LO CICERO

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